

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

MINNESOTA LIFE INSURANCE
COMPANY

Plaintiff,

-VS-

SHURWEST HOLDING COMPANY,
INC., an Arizona corporation; and
SHURWEST, LLC, an Arizona limited
liability company, THE QUANTUM
GROUP USA, LLC, an Arizona limited
liability company, and Ron Shurts, an
individual.

Defendants.

Case No.: 0:21-cv-01603-JNE-ECW

**JOINT STIPULATION FOR
DISMISSAL OF ACTION WITH
PREJUDICE [FRCP 41(a)(1)(ii)]**

Plaintiff Minnesota Life Insurance Company (“Minnesota Life”) and Defendants Shurwest Holding Company, Inc., Shurwest, LLC, The Quantum Group USA, LLC and Ronald L. Shurts hereby stipulate under Federal Rule of Civil Procedure 41(a)(1)(ii) that this action be dismissed with prejudice, with each party bearing that party’s own attorney’s fees and costs in this action.

Dated: October 12, 2022

s/ Shawn M. Raiter

Shawn M. Raiter (#240424)

David M. Wilk (#222860)

LARSON • KING, LLP

2800 Wells Fargo Place

30 East Seventh Street

St. Paul, MN 55101

Tel: (651) 312-6500

sraiter@larsonking.com

dwilk@larsonking.com

Robert D. Phillips, Jr. (*pro hac vice*
forthcoming)

Kathy J. Huang (*pro hac vice*
forthcoming)

Gillian H. Clow (*pro hac vice*
forthcoming)

ALSTON & BIRD, LLP

333 South Hope St, 16th FL

Los Angeles, CA 90071

Tel: (213) 576-1000

bo.phillips@alston.com

kathy.huang@alston.com

gillian.clow@alston.com

***Attorneys for Plaintiff Minnesota Life
Insurance Company***

Date: October 11, 2022

By: s/ J. Neil Stuart

Daniel G. Dowd (*pro hac vice*)

J. Neil Stuart (*pro hac vice*)

Cole K. Kubosumi (*pro hac vice*)

COHEN DOWD QUIGLEY P.C.

The Camelback Esplanade I

2425 East Camelback Road, Suite 1100

Phoenix, Arizona 85016

Tel: (602) 252-8400

ddowd@cdqlaw.com

nstuart@cdqlaw.com

ckubosumi@cdqlaw.com

Lindsey A. Davis (#0332148)

Mackenzie Moy (#0397013)

ZELLE LLP

500 Washington Avenue South, Suite 4000

Minneapolis, MN 55415

Tel: (612) 339-2020

ldavis@zelle.com

mmoy@zelle.com

***Attorneys for Defendants The Quantum Group
USA, LLC and Ronald L. Shurts***

Date: October 11, 2022

By: s/ Lennette W. Lee

Joseph N. Akrotirianakis (pro hac vice)

Lennette W. Lee (pro hac vice)

KING & SPALDING LLP

633 West Fifth Street

Suite 1600

Los Angeles, CA 90071

Telephone: (213) 443-4355

Facsimile: (213) 443-4310

jakro@kslaw.com

llee@kslaw.com

Cheryl A. Sabnis (MN Bar No. 295012)

KING & SPALDING LLP

50 California Street

Suite 3300

San Francisco, CA 94111

Telephone: (415) 318-1200

Facsimile: (415) 318-1300

csabnis@kslaw.com

***Attorneys for Defendants Shurwest, LLC and
Shurwest Holding Company, Inc.***